AO 91 (Rev. 11/11) Criminal Complaint

United States Courts
Southern District of Texas
FILED
JUN - 2 2016
David J. Bradley, Clerk of Court

# UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America
v.
Jonathan Lee EDWARDS

Defendant(s)

Case No. H16-827 M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, 2016 through June 1, 2016 in the county of Harris in the Southern District of Texas, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. 2252A(a)(2)(B) and 18 U.S.C. 2252A(a)(5)(B)	Distribution, Receipt and Possession of materials constituting and/or containing child pornography

This criminal complaint is based on these facts:

See the attached Affidavit

☑ Continued on the attached sheet.

[signature]
Complainant's signature

Marisa Schwartz, HSI Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 6/2/14

Dena Palermo
Judge's signature

City and state: Houston, Texas

Dena Hanovice Palermo, U.S. Magistrate
Printed name and title

AFFADAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Marisa Schwartz, being truly sworn and deposed state,

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), assigned to the Office of the Special Agent in Charge, Houston, Texas. I have been employed by Immigration & Customs Enforcement (ICE), Homeland Security Investigations (HSI), as an HSI agent for approximately seven years. I am currently assigned to the Cyber Investigations Group and as part of my daily duties as an HSI agent assigned to this group, I investigate criminal violations relating to child exploitation and child pornography including violations of Chapter 109A, Chapter 110 and Chapter 117, all contained within Title 18 of the United States Code. I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review examples of child pornography in various forms of media including computer media. I have also participated in the execution of search warrants and arrest warrants; a number of which involved child exploitation and child pornography offenses.

2. This affidavit is based on reports your affiant has read and conversations your affiant has had with law enforcement officers and investigators involved in this investigation. This affidavit does not set forth all of my knowledge in this matter, but is intended only to show that there is probable cause to believe that Jonathan Lee EDWARDS is in violation of Title 18 USC 2252A(a)(2)(B) and 2252A(a)(5)(B).

3. On April 14, 2016, HSI Special Agent (SA) W. Russell Hurst participated in an undercover operation on Craigslist.org. SA Hurst located an advertisement under the "Casual Encounters" portion of their website. The advertisement was titled "Taboo.... – m4w (Deer Park / pasadena)." This advertisement was posted in the section "m4w" defined as men seeking women with posting ID 5530445500.

The advertisement stated the following:

"Is there anyone out there that is into taboo situations, primarily family fun? I am very curious and would love to chat if you are...I know I can't be the only one :-)

Please put "family" in the subject line to weed out fakes and bots.
I also have kik...bmi4582"

4. On the same day, at approximately 12:32 a.m. CDT, SA Hurst (UC Agent) contacted Kik user "bmi4582" from his undercover Kik Messenger account. The Kik user bmi4582 was associated with the screen name "Jonathan EDWARDS."

5. During the conversation, at approximately 11:33 p.m. CDT, EDWARDS sent a Dropbox link to the UC Agent. This link contained 8 videos, 2 of which depicted child pornography.

6. SA Schwartz reviewed the Dropbox link sent by EDWARDS to the UC Agent and observed the following videos depicting child pornography:

In one video, labeled as Kitty1_x264.avi, a prepubescent female victim, approximately 4-6 years old, is observed wearing a headband and pink shirt. An adult male walks into the view of the camera with an exposed erect penis. He is wearing only a white t-shirt. The adult male makes the female child perform fellatio. At some point, the adult male removes his shirt and is totally nude. During the video, the camera zooms in to focus on the female child's face and the adult male's erect penis. Towards the end of the video, the adult male ejaculates into the mouth of the female child.

In another video, labeled bad 07.mpg, two female child victims, approximately 13-15 years of age, are lying nude on a bed and kissing each other. A male child, approximately 11-13 years of age is sitting next to them watching. At some point, the male child uses his fingers to rub the exposed vagina of one of the female children.

7. On April 15, 2016, HSI Senior Intelligence Research Specialist Pamela Hanks searched the Texas Department of Public Safety Driver License Image Retrieval and located a Texas Driver's License (TXDL) belonging to Jonathan Lee EDWARDS, from Deer Park, TX. The individual in the photograph in the TXDL appears visually similar to the individual depicted in the photographs sent by EDWARDS to the UC Agent during the Kik Messenger conversations.

8. On April 17, 2016, Investigator Bruce Moats with the Fort Bend County District Attorney's Office submitted an administrative subpoena to Dropbox, Inc. for information pertaining to the Dropbox link sent by EDWARDS during the Kik Messenger conversation with SA Hurst's UC account.

9. On May 2, 2016, Investigator Moats sent SA Schwartz information he received from Dropbox, Inc. regarding the Dropbox link EDWARDS sent containing child pornography. The following was the information received for the link:

Link: https://www.dropbox.com/sh/mn4tg2x3xklvl1u/AACd5m0vT3k0jfN1tWrgLjPia?dl=0

Name: Jonathan Edwards

Email: cameraman4582@gmail.com

User: 151432606

Joined: 2013-03-08 19:10:59 GMT

Subscription status: Not paid

Login Timestamps (GMT) and IPs:

2016-04-10 @ 21:36:01, IP 98.196.223.123

2016-04-10 @ 23:18:10, IP 98.196.223.123

2016-04-15 @ 03:36:05, IP 98.196.223.123

2016-04-15 @ 03:39:27, IP 98.196.223.123

10. On May 9, 2016, SA Schwartz submitted a summons to Comcast Cable Communications, LLC for information pertaining to IP address 98.196.223.123 on April 15, 2016 at 04:19:57 UTC and Remote Port: 41480 (This date and time coverts to April 14, 2016 at 11:19 p.m. CDT, which was around the time the Dropbox link containing the child pornography referenced in paragraph 5 was sent to the UC Agent).

11. On May 10, 2016, SA Schwartz received a response from Comcast Cable Communications, LLC with the following:

Subscriber Name:	Lee Edwards
Service Address:	Deer Park, TX
Type of Service:	High Speed Internet Service
Start of Service:	Unknown
Account Status:	Active
IP Assignment:	Dynamically Assigned
E-mail User Ids:	itsme77536@comcast.net

12. On June 1, 2016, HSI/Houston Special Agents (SA) assigned to the Cyber Investigations Group (CIG), along with other members of the Houston Metro Internet Crimes Against Children Task Force (HMICAC), executed a federal search warrant at Jonathan Lee EDWARDS residence in Deer Park, Texas.

13. During the execution of the federal search warrant, HSI Computer Forensic Agent (CFA) Juan Avalos confirmed the presence of child pornography located on a Samsung Galaxy S7 recovered from EDWARDS' pants pocket. While conducting an on-site forensic preview of the cellular telephone, CFA Avalos located a Kik Messenger application. After opening the Kik Messenger application, the account was logged in to username "bmi4582" with screen name "Jonathan Edwards."

14. CFA Avalos observed a text conversation between EDWARDS and another individual with username "yeahhhhp" with screen name "Dooby Do," which began on or about Friday, May 27, 2016. SA Schwartz reviewed the conversation and the following contains a portion of the conversation observed:

> EDWARDS: This message contained an image depicting a pre-pubescent, female victim, approximately 8-10 years of age. The female victim is lying on her back, wearing a red t-shirt with blue jean pants. The blue jeans are pulled down around her thighs and her vagina is exposed.
>
> Dooby Do: Cuties
>
> Dooby Do: Very nice pussy
>
> EDWARDS: Yes
>
> Dooby Do: Sooooo lickable
>
> EDWARDS: And very fuckable
>
> Dooby Do: Haha yup
>
> Dooby Do: Few too many clothes though
>
> EDWARDS: Do you have anything else?
>
> Dooby Do: This message contained an image depicting a pre-pubescent, female victim, approximately 6-8 years of age. The female victim is sitting in a white plastic

chair and is fully nude with her vagina exposed.

EDWARDS: Mmmm

15. During the on-site forensic preview, CFA Avalos observed 10 images depicting child erotica of a female victim, approximately 5-7 years of age, who is known to be a relative of EDWARDS. The female child was lying on a bed wearing a black and white dress with pink ruffles. The female child was lying on her stomach and the camera was positioned with a view of the child's pink underwear. Each photo depicted the child's legs in a different position, but was taken in the same general timeframe.

Marisa Schwartz
Special Agent
Homeland Security Investigations

SUBSCRIBED and SWORN
Before me this 2nd day of June 2016

Dena Hanovice Palermo
United States Magistrate Judge
Southern District of Texas